

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

LUZ DE AMOR EYTALIS

Plaintiff,

v.

NATIONAL ASSOCIATION OF REALTORS (NAR),

TEXAS ASSOCIATION OF REALTORS (TAR),

WICHITA FALLS ASSOCIATION OF REALTORS (WFAR),

PARAGON MLS CONNECT (MLS),

Civ #. 7-24CV-147-0

Defendants.

**MOTION TO COMPEL DISCLOSURE OF FINANCIAL AND LEGAL
ARRANGEMENTS BETWEEN DEFENDANTS**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

COMES NOW Plaintiff, **Luz de Amor Eytalis**, Pro se, respectfully submits this Motion to Compel Disclosure of Financial and Legal Arrangements Between Defendants, and in support thereof, states as follows:

I. INTRODUCTION

1. Plaintiff has initiated this lawsuit alleging breach of contract, improper enforcement of membership dues, ambiguity in bylaws, and other claims against Defendants **NAR**, **TAR**, **WFAR**, and **Paragon MLS**.
2. Plaintiff has reason to believe that Defendant **National Association of Realtors (NAR)** is funding or otherwise supporting the legal defense of Defendant **Wichita Falls Association of Realtors (WFAR)** and potentially other Defendants in this case.

3. The financial and legal relationship between Defendants raises questions of potential conflicts of interest, undue influence, and operational independence, which are directly relevant to the claims and defenses in this matter.

II. ARGUMENTS AND RELIEF REQUESTED

A. Financial Arrangements Impact Transparency and Independence

1. Plaintiff requests that the Court compel Defendants to disclose the existence and scope of any financial or legal support provided by NAR to WFAR or other Defendants.
2. Such disclosure is necessary to assess whether WFAR is acting independently in its defense or is unduly influenced by NAR, particularly if NAR's funding affects the positions or strategies advanced by WFAR in this litigation.

B. Potential for Conflicting Legal Theories

1. If Defendants present inconsistent defenses, such as WFAR claiming that NAR's policies caused the dispute or NAR arguing that WFAR acted independently, any funding arrangement may create a conflict of interest that undermines the fairness of these proceedings.
2. Plaintiff requires this information to evaluate whether Defendants' positions are aligned or if NAR's financial influence compromises WFAR's ability to defend itself freely.

C. Legal Authority Supports Disclosure

1. **Federal Rules of Civil Procedure, Rule 26(b)(1)**: Allows discovery of nonprivileged matter relevant to any party's claim or defense, including information regarding funding arrangements and inter-defendant relationships.
2. **Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009)**: Establishes that undue influence and conflicts of interest can undermine the integrity of judicial proceedings, emphasizing the importance of transparency in such matters.
3. **Restatement (Second) of Contracts § 206**: Ambiguities in governing documents, such as the bylaws in this case, should be construed against the drafting party (Defendants), particularly when questions of enforcement arise from unclear relationships or policies.

III. REQUESTED RELIEF

For the reasons stated above, Plaintiff respectfully requests that the Court order Defendants to:

1. Disclose all financial arrangements, agreements, or communications reflecting funding or legal support provided by NAR to WFAR or any other Defendant.
2. Clarify the governance and operational relationships between NAR, TAR, WFAR, and Paragon, including whether NAR exercises oversight or control over WFAR or Paragon's operations and decision-making.
3. Provide transparency regarding any joint defense agreements or shared legal strategies among Defendants.

4. Grant any further relief the Court deems just and proper.

IV. CONCLUSION

Transparency and independence are fundamental to ensuring a fair trial. Plaintiff contends that disclosure of financial arrangements and governance relationships among Defendants is critical to evaluating the claims and defenses in this case.

Respectfully submitted,

Respectfully submitted, Pro se Plaintiff

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Luz de Amor Eytalis

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CERTIFICATE OF SERVICE

I hereby certify that on November _____, 2024, a true and correct copy of the Plaintiff's Motion for Preliminary Injunction was served on all counsel of record for the Defendants by

_____.

Respectfully submitted,

Pro se Plaintiff

_____.

Luz de Amor Eytalis